

### REMARKS

This application has been reviewed in light of the Office Action dated September 25, 2007. Claims 12-20 are the only claims presented for examination. Claims 12, 16, 17 and 20 are in independent form, and have been amended to define still more clearly what Applicant regards as his invention. Favorable reconsideration is requested.

In the outstanding Office Action, Claims 12 and 16-20 were rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent 5,185,661 (Ng). In addition, Claim 13 was rejected under 35 U.S.C. § 103(a) as being obvious from Ng in view of U.S. Patent 6,058,207 (Tuijn), and Claims 14 and 15, as being obvious from Ng in view of the cited Berns et al. article.

Before addressing the outstanding rejections, Applicant wishes to thank the Examiner for the additional comments provided in the Office Action on the Examiner's analysis of the prior art and of his application thereof to the claims. Applicant believes strongly that the aspects of the present invention to which the independent claims are directed are allowable over the art, and Applicant has made a further effort to clarify the language of the claims to make this distinction clear. In particular, the claim language has been amended to make it even clearer that the plural surface gradation lines are independent of each other, and also that the plural internal gradation lines are independent of each other. The "surface gradation lines" correspond to, e.g., Fig. 19, the "internal gradation lines" correspond to, e.g., Fig. 22, the "mapped surface gradation lines" correspond to, e.g., Fig. 20, and the "mapped internal gradation lines" correspond to, e.g.,

Fig. 23.<sup>1</sup> Accordingly, Applicant believes that the claim language now makes it completely clear that the plural surface gradation lines indicate the shape of the surface of a first gamut, and that each surface gradation line indicates the locus of color change.

As is set out in each of the independent claims, the color change in the first gamut (which is the gamut before mapping) is defined by using the plural mutually independent surface gradation lines and the plural mutually independent internal gradation lines. The color change in the second gamut, which is the gamut after mapping, is defined by using the plural mutually independent mapped surface gradation lines and the plural mutually independent mapped internal gradation lines. This use of the mutually independent surface and internal gradation lines makes it possible to effect an appropriate conversion of an input color in the first gamut into an output color in the second gamut. This feature, however, is not disclosed in *Ng*, nor does the system of that patent provide the capability that Applicant has provided of making an appropriate conversion from a first to a second color gamut.

More specifically, as illustrated in Fig. 8 of *Ng*, an input color is mapped within an output gamut. In this mapping, conversion conditions such as are illustrated in Fig. 7 of *Ng* are used. However, Applicant submits that nothing in *Ng* would in any way teach or suggest the above characteristic of the present independent claims, namely the mutual independence of the gradation lines.

It is stated in the Office Action that “surface gradation line” in the present claims is deemed to correspond to the boundary surface 23 in Fig. 8 of *Ng*, and that the

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<sup>1/</sup> It is of course to be understood that the claim scope is not limited by the details of this or any other particular embodiment that may be referred to.

“internal gradation line” in the present claims is deemed to correspond to the region 21 in Fig. 8 of *Ng*. Further, it is explained in the Office Action that the “mapped surface gradation line” in the present claims is taken as corresponding to the boundary surface 23, and the “mapped internal gradation line” to the region 21 in Fig. 8 of *Ng*. In other words, although the before-mapping line is clearly defined to be different from the after-mapping line in the present claims, the before-mapping line and the after-mapping line are the same in *Ng*. This is a most important point.

Moreover, the Office Action notes that “sample points” and “two calculating steps” in the present claims correspond to the LUT 20 and the interpolation 22 shown in Fig. 9A of *Ng*. However, in *Ng*, the color gamut compression shown in Figs. 7 and 8 is performed on the color gamut compression LUT 34 in Fig. 5 (color gamut compression LUT 34 in Fig. 9B). That is, in the *Ng* apparatus, it is apparent that the color gamut compression as shown in Figs. 7 and 8 is not performed on the LUT 20 and the interpolation 22 shown in Fig. 9A.

Accordingly, it is believed that the LUT 20 and the interpolation 22 of *Ng*, which are different from gamut mapping, cannot be applied to the gamut mapping that is performed according to Applicant’s independent claims.

For these reasons, the independent claims are believed to be allowable over *Ng*.

A review of the other art of record, including *Tuijn* and *Berns*, has failed to reveal anything which, in Applicant’s opinion, would remedy the deficiencies of the art discussed above, as a reference against the independent claims herein. Those claims are therefore believed patentable over the art of record.

The other claims in this application are each dependent from Claim 12, and also are believed to be clearly patentable for the reasons discussed above. Nevertheless, because each dependent claims recites an additional aspect of the invention, the independent reconsideration of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and allowance of the present application.

Applicant's undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,

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